

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

STATUS REPORT TO COURT

Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the S.S. CENTRAL AMERICA. Plaintiff has previously submitted twenty-nine reports, two in Civil Action No. 2:14-cv-160, and twenty-seven in Civil Action No. 2:87-cv-363. *See* ECF # 21 and 90 (No. 2:14-cv-160); ECF # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292, 293, 294, 295, 303, 304, and 323 (No. 2:87-cv-363).

As reported in May 2024 (ECF # 323), the Trustee, John Pidcock, together with RLP’s salvage adviser, Craig T. Mullen, ceased its association with Eclipse Group, Inc. (“Eclipse”) for the Court approved salvage of the wreck of the S.S. CENTRAL AMERICA in 2024. ECF #321. The vessel Eclipse identified for the operation became unavailable during the scheduled salvage window, and despite efforts by the Trustee and Mr. Mullen, an alternative vessel with comparable technical capabilities was unable to be secured, resulting in RLP’s ability to execute the salvage plan in 2024.

Since then, the Trustee has continued to work with salvage advisor Mr. Mullen on planning for the next salvage operation. In this regard, Mr. Mullen and the Trustee have identified four (4) potential salvors for a 2025 salvage operation and are currently evaluating and assessing each

candidate's qualifications, equipment specifications, and vessel availability. For confidentiality, the Trustee has withheld detailed information regarding these salvors from this report but stands ready to submit this information under seal should the Court wish to review them.

The Trustee anticipates presenting a plan for salvage in 2025 and request for approval to the Court on or before January 31, 2025. Any salvage plan for 2025 is expected to closely align with the operations previously authorized by the Court. ECF # 321.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. CENTRAL AMERICA lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. ECF # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report.

This 8th day of November, 2024.

/s/ James L. Chapman, IV
James L. Chapman, IV, Esquire (VS. No. 21983)
K. Barrett Luxhoj, Esquire (VS. No. 86302)
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November, 2024, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

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